UNRESOLVED ISSUES ON VERIZON VIRGINIA CARRIER-TO-CARRIER GUIDELINES
(REPORT OF THE VIRGINIA COLLABORATIVE COMMITTEE*)

	Metric	Issue Description	Parties Position(s)	Verizon Position
1.	OR-1/OR-2 Order Confirmation Timeliness and Reject Timeliness	Should the measured interval for notice for flow-through orders exclude SOACS hours of scheduled unavailability until eTRAK is fully implemented in Virginia?	AT&T states that downtime hours should not be based on retiring SOACS system as those are apparently longer than eTRAK and would result in revising metric in January and delay the adoption of new standards when eTRAK systems are in place. Alternatively, metric should be revised to include both eTRAK and SOACS downtime hours so upon retirement of SOACS, eTRAK hours would be standard. In addition, statement that as of 1/1/02 only eTRAK hours would be in effect should be added to Guidelines. (See AT&T's comments submitted 8/6/01.)_	Verizon states it has included revised statements in its 8/6 revisions to address some of AT&T's concerns on inclusion of the hours of unavailability of eTRAK. However, Verizon states it cannot agree to the application of eTRAK hours commencing 1/1/02 because not all retail customer orders will be transferred to eTRAK as of this date. (See Verizon's comments submitted 8/28/01.)
2.	OR-4 Timeliness of Completion Notification (submetrics 11-15)	Should time period for completion notification be based on SOACS or eTRAK system capabilities?	AT&T states that since most CLECs use eTRAK and SOACS is being phased out, it is more reasonable to adopt shorter eTRAK timeframe in Guidelines. As an alternative, at a minimum, eTRAK timeframes should be included and a statement made in Guidelines that will be effective 1/1/02. AT&T points out that Verizon has admitted that its retail systems are already 90% converted to eTRAK, therefore, eTRAK is the more appropriate standard to use. In addition Verizon has not announced when if ever, SOAC will be retired, which means that the more lenient standard may continue indefinitely even if only one retail customer remains on SOAC. (See AT&T's comments submitted 8/3/01.)	Verizon states that the description of the submetrics contained in the NY Guidelines is included in the Virginia Guidelines. However, Verizon states it has proposed a footnote increasing the interval by one day for OR-4-11-13 and two days for OR-4-14-15 because of the way the SOACS system used in Virginia interacts with CRIS and Request Manager systems. According to Verizon, when SOACS is retired the shorter NY intervals will apply. Verizon cannot agree to 1/1/02 termination date proposed by AT&T because not all retail customers accounts will be transferred from SOACS to eTRAK by then and SOACS will need to be used for CLEC orders that more a retail customer that is served by SOACS from Verizon to a CLEC. (See Verizon's comments submitted 8/28/01.)

* **Note:** Parties have submitted written comments to the Performance Standards/Remedy Plans Subcommittee on various issues. These documents are available to the public on the Division of Communications' webpaage. In addition, Verizon has provided Open Issue Reports on a routine basis to all participants in the Performance Standards/Remedy Plans Subcommittee. Parties should be permitted to file further comments with the Commission on unresolved issues to detail their positions on the various unresolved issued.

3.	OR-6-04 Order Accuracy	Initial: Should a directory listing metric be adopted? Subsequent: Does Verizon's proposed metric adequately addresses parties' concerns?	Cavalier requested the addition of a metric "to account for directory publishing errors." (See Cavalier's comments submitted 4/2/01.) AT&T states that the proposed directory listing metric measures accuracy but does not measure omissions from the directory. Therefore, the metric falls short on order completeness. A comparison to LSR will not pick up any lost directory listings which have omitted customer information from the directory entirely. In addition, AT&T submits that the proposed metric does not collect a statistically valid sample of stand-alone orders. (See AT&T's comments submitted 8/3/01.) KPMG opened Exception 1 in the Virginia OSS test, showing that Verizon "failed to properly update its Directory Listings database according to properly ordered directory listing change." This exception remains open. Cox states that the Verizon proposed OR-6-04 does not adequately measure the possible problems that occur with directory listings. Cox proposes that an overall 98% accuracy level should be adopted which translates to a 99% accuracy requirement for Verizon. Further, states that the metric should be revised to apply to the most current two versions of software. Cox also states that all types of directory listings (i.e. stand-alone, nonpublished) need to be included in metric. In addition, Cox states that its customers are not concerned with how listings appear in a database but how listing ends up in the book. Cox wants a measurement that compares what is submitted to what is in book. (See Cox comments submitted 8/3/01.)	Initially, Verizon opposed the adoption of a new metric. (From Verizon's Response 4/17/01.) However, Verizon subsequently agreed to add the directory listing measure it recently proposed in PA. (From Verizon's Open Issues Report 7/23/01.) Verizon states it is unlikely that there will be directory listing omissions resulting from "lost" orders. Verizon states that AT&T has not shown there are a substantial number of lost orders and that it is unlikely that if an order is lost that it will remain lost. Verizon states there are a series of checkpoints for orders that CLECs may follow if an order becomes lost that will allow correction of the loss before a directory listing omission will result. In addition, two other metrics measures potentially lost orders. Verizon further states that stand-alone orders are included in the metric and there is no reason to adopt a separate measurement for such orders. In response to Cox, Verizon states the 95% standard is reasonable and that coupled with other aspects of the directory listing process it should result in a level of accuracy that is greater than 95% because the standard reflects a comparison of the completed order to the original LSR, while the series of checks between completion of the order and publication of the directory should result in a greater than 95% accuracy. Cox has not shown 99% accuracy is feasible and in fact would require Verizon to "pay" for Cox's directory listing errors. Verizon states that a metric that compares submitted orders to listings in published directories would be difficult and expensive to implement as it would be a manual, labor intensive process and would unfairly hold Verizon solely responsible for accuracy of listings. Verizon has agreed to adopt Cox's recommendations related to measurement of new versions of LSOG and to add Field 94, Yellow Pages Heading, to the measurement. Verizon does not agree with Cox's proposal to add Fields 15, 86, 87, and 88 to the measurement. (See Verizon's comments submitted 8/28/01.)

4.	PR-9-02 Hot Cut Loops	Initial: Should a Hot Cut premature disconnect performance measurement be adopted? Subsequent: What is the appropriate performance standard for Hot Cut premature disconnects?	Cavalier requested the addition of metric "to account for premature disconnects." (See Cavalier's comments submitted 4/2/01.) Cavalier agrees to metric, however, proposes a standard of 99.5% hot cuts completed without a premature disconnect.	Initially, Verizon opposed adoption of a new metric. (See Verizon's Response 4/17/01.) However, Verizon subsequently proposed adding the PR-9-02 metric utilized under KPMG's OSS testing performance standards. Verizon has proposed a 2% performance standard for this metric (i.e. 98% completed without premature disconnect).
5.	PR-3 Completed with specified number of days (1-5 lines)	Initial: Should an interval measure for Hot Cuts be adopted? Subsequent: Should the Commission wait for adoption of this metric as consensus item in NY?	Cavalier requested the adoption of a benchmark for UNE loops of 5 days. Cavalier has not agreed to wait until metric is adopted in NY.	Verizon states the NY Carrier Working Group has reached consensus to add Hot Cut product disaggregation to PR-3-08: % completed with 5 Days, 1-5 Lines no dispatch. Verizon proposes to add this measure to the Virginia Guidelines once it is adopted as a consensus item in NY. (From Verizon's Open Issues Report 7/23/01.)
6.	Appendix H	Should the Guidelines include the Flow Through Ordering Scenarios list instead of reference to website?	AT&T states that the Flow Through Ordering Scenarios are listed in NY Guidelines and therefore inconsistent with agreement to adopt NY Guidelines for Virginia. This list should be considered a baseline of Verizon's obligations. Verizon would be able to improve flow-through by adding order scenarios by a reference to a web site, but should not be able to degrade performance by a simple reference. AT&T states that reference to website would permit Verizon to change metrics without notice and Commission approval. The Change Management Process only provides notice but does not provide an opportunity for prior approval by the CLECs or by the Commission. (See AT&T comments submitted 8/6/01.)	Verizon states that a list of the type of orders that flow through will result in the Appendix being out-of-date almost as soon as it is adopted in the Guidelines. Verizon proposed to include a list as of date of Guidelines but with a statement that the list is illustrative and subject to change with updated list on website. Verizon states that changes to the types of orders that flow through are communicated to CLECs through Change Management Process and cannot be implemented without their knowledge. (See Verizon's comments submitted 8/28/01.)

7.	Exhibit 1	Should Exhibit 1 be included in Guidelines?	AT&T objects to inclusion because not included in NY Guidelines and states it should be deleted in its entirety. In addition, AT&T states the Exhibit improperly includes issues that should be addressed in the PAP, are imprecise, contradict other provisions in the Guidelines, and mask discriminatory performance. According to AT&T, the addition of this four pages of new terms and conditions grants Verizon "sweeping exceptions to its measurements and reporting obligations." Exhibit 1 should be rejected because it concerns remedies. AT&T takes particular exception to provisions on "Skewed Data" which would exempt Verizon for responsibility of meeting performance standard if failure resulting from (a) a Force Majeure event; (b) a statistically invalid measurement or (c) Event Driven Clustering, Location Driven Clustering, or CLEC Actions as described in Appendix K. AT&T states these proposed exemptions undermine the very purpose of the Guidelines -- to measure and report Verizon's performance. The PAP will govern the remedies and may contain provisions for non-compliance to Force Majeure events. It is not realistic to assume, as Verizon does, that the Commission will fail to adopt a PAP and that therefore a Force Majeure provision is required in the metrics. Further AT&T objects to inclusion of Verizon's proposed confidentiality protection for "Verizon Information" in Exhibit 1. Much of the Verizon information sought to be "protected" in Virginia is public information in New York. AT&T states it is not included in NY Guidelines, is unsupportable, hopelessly overreaching, and will keep public information from both the public and entities that have a legitimate need or right to know. The New York discussions cited by Verizon are not relevant tot he issue debated here. -AT&T also objects to the unilateral imposition of CLEC obligations in the Exhibit, including forecasting requirements. The forecasting requirements are in issue in the arbitration between Verizon and AT&T before the FCC and should not be unilaterally imposed through the Exhibit. (See AT&T comments submitted 8/6/01.) Covad also objects to the inclusion of Exhibit 1 in the Guidelines.	Verizon proposes the adoption of Exhibit 1 to provide for "Skewed Data" (including Force Majeure and statistical invalidity), Confidentiality, and CLEC obligations, provisions. Verizon should be excused from a failure to meet a performance standard as a result of a Force Majeure event or a statistically invalid measurement. (From Verizon's Open Issues Report 7/23/01.) Verizon states that its proposed Exhibit 1 contains several provisions that are critical for the fair operations of the VA Guidelines and if the Exhibit is not adopted, they should be implemented by Commission order. According to Verizon, Exhibit 1 is substantially the same as Exhibit 1 adopted in PA and NJ. Verizon states that its "Skewed Data" section addresses two important points: (1) that it should not be held responsible for a Force Majeure event (an event beyond Verizon's reasonable control that results in a performance standard being missed, such as a flood or a strike); and (2) that it should not be held responsible for an apparent failure to meet a standard that was a result of a statistical invalidity in measurement and not an actual deficiency in performance. Verizon disagrees with AT&T that the "Skewed Data" section should be addressed only in the PAP, because Verizon has an obligation to comply with the Guidelines and there is no requirement that the Commission ever adopt a PAP. Verizon further claims the "Skewed Data" section is consistent with the Guidelines fair, and simple to administer. Verizon states that Exhibit 1 contains confidentially requirements that protects the information contained in the performance reports, including CLEC specific information. Verizon would agree to propose changes to the confidentiality rules if such changes are adopted by NY PSC as a result of recent NY Carrier Working Group discussions. Verizon also supports the requirement in the Exhibit for CLECs to comply with forecasting and other provisions of the VA Guidelines. Verizon states that these Guidelines are not inconsistent with interconnection agreement obligations because they will operate independently of a CLEC's interconnection agreement with Verizon. (See Verizon comments submitted 8/28/01.)